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REMARKS/ARGUMENTS

With respect to Applicants previous amendment, Applicants appreciate the Examiner's consideration and entry of the Amendment.

With respect to the claim rejections under 35 USC § 102, the Office Action relies on a series of pages apparently printed from a web archive. The Office Action states the claims are anticipated by "the GO network partners." When the Applicants attempt to use the "WayBack Machine" to search for www.go.com and select the entry circled, the Applicants are not linked to any of the pages included with the Office Action.

A second page included with the Office Action includes a circle encompassing Go Network Partners, ABC.com, ABCnews.com, Disney.com, and ESPN.com, among others. Further pages indicate searches for www.abc.go.com, www.movies.go.com, and www.espn.go.com.

A domain name is defined by Whatis.com as follows:

A domain name locates an organization or other entity on the Internet. For example, the domain name www.totalbaseball.com locates an Internet address for "totalbaseball.com" at Internet point 199.0.0.2 and a particular host server named "www". The "com" part of the domain name reflects the purpose of the organization or entity (in this example, "commercial") and is called the top-level domain name. The "totalbaseball" part of the domain name defines the organization or entity and together with the top-level is called the second-level domain name. The second-level domain name maps to and can be thought of as the "readable" version of the Internet address.

A third level can be defined to identify a particular host server at the Internet address. In our example, "www" is the name of the server that handles Internet requests. (A second server might be called "www2".) A

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third level of domain name is not required. For example, the fully-qualified domain name could have been "totalbaseball.com" and the server assumed.

Subdomain levels can be used. For example, you could have "www.nyyankees.totalbaseball.com".

Each of the searches provided are examples of third-level and subdomain names. To dissect an example provided, www.abc.go.com includes third-level and subdomain names "www" and "abc", and second-level domain name "go.com", which includes top-level domain name "com."

Applicants submit that each of the previously presented claims is in condition for allowance.

None of the cited references teach the specific combination as recited in claim 16. For example, none of the cited references teaches a method of offering a plurality of interrelated products through a plurality of interrelated websites including the method steps of establishing a first website having a first website domain name, where the first website domain name includes *a first second-level domain name portion formed from a common name portion, a first product name portion, and a top-level domain portion*, and where the first product name portion identifies a first product of the plurality of interrelated products offered for sale via the first website.

Further, none of the cited references teach or suggest establishing a second website having a second website domain name, where the second website domain name includes *a second second-level domain name portion formed from the common name portion, a second product name portion, and the top-level domain portion*, and where the second product name portion identifies a second product of the plurality of interrelated products offered for sale via the second website. In addition, none of the cited references teach that the second product offered via the second site is related to the first product offered via the first site.

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In contrast to claim 16, the cited pages depict pages having subdomain name addresses of second level domain name "go.com".

Further, none of the cited references teach creating a website direct link between the first website (having a first identifying product name and offering a first product) and the second website (having a second identifying product name and offering a second product). The cited reference pages show links between sites, but not between different product offering sites where each product offering site has a product identifying portion within the respective website domain name. For at least the foregoing reasons, claim 16 is in condition for allowance.

None of the cited references disclose the specific combination as recited in claim 19. For example, none of the cited references disclose a method of offering a plurality of interrelated products through a plurality of interrelated websites including the method steps of establishing a first website having a first website domain name, where the first website domain name includes *a first second-level domain name portion formed from a common name portion, a first product name portion, and a top-level domain portion*, and where the first product name portion identifies a first product of the plurality of interrelated products offered for sale via the first website.

Further, none of the cited references teach or suggest establishing a second website having a second website domain name, where the second website domain name includes *a second second-level domain name portion formed from the common name portion, a second product name portion, and the top-level domain portion*, and where the second product name portion identifies a second product of the plurality of interrelated products offered for sale via the second website. In addition, none of the cited references teach that the second product offered via the second site is related to the first product offered via the first site. In contrast to claim 19, the cited pages depict websites having subdomain name addressing.

Further, none of the cited references disclose establishing a third website having a third website domain name, where the third website domain name includes *a third second-level domain name portion formed from the common name portion, a third product name portion, and the top-level domain portion*, and where the third product name portion describes a third

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product of the plurality of interrelated products offered for sale via the third website. Further, the cited references fail to disclose that the third product is related to the first product and is related to the second product, and that the third website is separately accessible via the electronic communications network.

Further, none of the cited references teach that the first website includes a direct link to the second website and includes a second direct link to the third website, the second website includes a third direct link to the first website and a fourth direct link to the third website, and the third website includes a fifth direct link to the first website and a sixth direct link to the second website. Thus, claim 19 is allowable over the cited references.

None of the cited references teach the specific combination as recited in claim 23. For example, none of the cited references teach a method of offering a plurality of interrelated services through a plurality of interrelated websites including the method steps of establishing a first website having a first website domain name, where the first website domain name includes *a first second-level domain name portion formed from a common name portion, a first service name portion, and a top-level domain portion*, and where the first service name portion identifies a first service of the plurality of interrelated services identified via the first website.

Further, none of the cited references teach or suggest establishing a second website having a second website domain name, where the second website domain name includes *a second second-level domain name portion formed from the common name portion, a second service name portion, and the top-level domain portion*, and where the second service name portion identifies a second service of the plurality of interrelated services identified via the second website. In addition, none of the cited references teaches that the second service offered via the second site is related to the first service offered via the first site. In contrast to claim 23, the cited pages depict websites having subdomain name addressing.

Further, none of the cited references disclose establishing a third website having a third website domain name, where the third website domain name includes *a third second-level domain name portion formed from the common name portion, a third service name portion, and the top-level domain portion*, and where the third service name portion describes a third

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service of the plurality of interrelated services identified via the third website. Further, the cited references fail to disclose that the third service is related to the first service and is related to the second service, and that the third website is separately accessible via the electronic communications network.

Further, none of the cited references teach that the first website includes a direct link to the second website and includes a second direct link to the third website, the second website includes a third direct link to the first website and a fourth direct link to the third website, and the third website includes a fifth direct link to the first website and a sixth direct link to the second website. Thus, claim 23 is also allowable over the cited references.

Claims 17-18, 20-22, 24-25, 29-30, and 34-38 depend from one of the independent claims referenced above. Since each of the independent claims is allowable, each of the dependent claims is likewise allowable.

In addition to the reasons for allowability presented above, Applicants have demonstrated commercial success and other secondary consideration. Furthermore, Applicants respectfully disagree that the previous arguments are not persuasive. Applicants respectfully reassert and maintain all arguments made in prior communications to the USPTO regarding this application.

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For at least the foregoing reasons, each of the pending claims 16-25, 29-30, and 34-38 are submitted to be in condition for allowance and allowance of the pending claims is respectfully requested.

In conclusion, Applicants have overcome all of the Office's rejections, and early notice of allowance to this effect is earnestly solicited. If, for any reason, the Office is unable to allow the Application on the next Office Action, and believes a telephone interview would be helpful, the Examiner is respectfully requested to contact the undersigned attorney.

Respectfully submitted,

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Date

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